

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

**\* \* \***

DWAYNE L. SCHOMER, as special  
administrator of THE ESTATE OF KEATON  
M. SCHOMER and individually; and  
BRAYLEN SCHOMER, individually,

Plaintiffs,

vs.

ELKO COUNTY; SHERIFF AITOR  
NARVAIZA, individually; UNDERSHERIFF  
JUSTIN AIMES, individually; SERGEANT  
MICHAEL SILVA, individually; DEPUTY  
TREVOR L. SNEED, individually; DEPUTY  
DOUGLAS HOLLADAY, individually;  
DEPUTY ERIKA GONZALEZ, individually;  
DEPUTY DAVID HATCH, individually;  
DEPUTY HANNAH KENDALL, individually;  
MEDALLUS & VACHAROTHONE LTD; DR.  
RACHOT VACHAROTHONE, individually;  
BAILEY POWELL, individually; GEOFFREY  
FISHER, individually; MERCEDES  
COCHRELL, individually; LETISCYA  
CHACON, individually; DOE SUPERVISORS  
I-X; DOE DEPUTIES I-X; DOE MEDICAL  
STAFF I-X; and ROE ENTITIES I-X,

Defendants.

CASE NO. 3:23-cv-00390-ART-CSD

**PROTECTIVE ORDER**

SCHOMER and individually, and BRAYLEN SCHOMER, individually (collectively, “Plaintiffs”), by and through their undersigned attorneys at Clark Hill PLLC, Defendants ELKO COUNTY, SHERIFF AITOR NARVAIZA, UNDERSHERIFF JUSTIN AMES, SERGEANT MICHAEL SILVA, DEPUTY TREVOR L. SNEED, DEPUTY DOUGLAS HOLLADAY, DEPUTY ERIKA GONZALEZ, DEPUTY DAVID HATCH, and DEPUTY HANNAH KENDALL (collectively, “Elko Defendants”), by and through their undersigned attorneys at Erickson, Thorpe & Swainston, Ltd.; and Defendants MEDALLUS & VACHAROTHONE LTD, DR. RACHOT VACHAROTHONE, BAILEY POWELL, GEOFFREY FISHER, MERCEDES COCHRELL, and LETISCYA CHACON, (collectively, “Medallus Defendants”) by and through their undersigned attorneys at Rencher Anjewierden, hereby files this Joint Motion for Agreed Entry of Protective Order.

To facilitate discovery in this case and to protect allegedly confidential information from public disclosure, the parties request this Court to enter the attached Agreed Protective Order (Exhibit “A”) covering certain discovery in this case, specifically items from Lexipol, LLC. The Parties have agreed to the terms in the attached protective order.

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1 WHEREFORE, the Plaintiffs and Defendants respectfully ask the Court to sign and enter  
2 the attached proposed agreed protective order.

3 Respectfully submitted this 19th day of September 2024.

4 **CLARK HILL PLLC**

**RENCHER ANJEWIERDEN**

5  
6 /s/ Paola M. Armeni, Esq.  
7 PAOLA M. ARMENI, ESQ.  
8 Nevada Bar No. 8357  
9 WILLIAM D. SCHULLER, ESQ.  
10 Nevada Bar No. 11271  
11 1700 S. Pavilion Center Dr., #500  
12 Las Vegas, Nevada 89135

*Attorneys for Plaintiffs, Schomer Family*

**ERICKSON, THORPE & SWAINSTON, LTD.**

13 /s/ Brent L. Ryman, Esq.  
14 BRENT L. RYMAN, ESQ.  
15 Nevada Bar No. 8648  
16 PAUL M. BERTONE, ESQ.  
17 Nevada Bar No. 4533  
18 1885 S. Arlington Ave., Suite 205  
19 Reno, Nevada 89509

*Attorneys for Elko County Defendants*

/s/ Benjamin K. Lusty, Esq.  
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Salt Lake City, Utah 84111

**RUBSY LAW, PLLC**  
CHRISTOPHER RUSBY, ESQ.  
Nevada Bar No. 11452  
36 Stewart Street  
Reno, Nevada 89501

*Attorneys for Medallus Defendants*

# **Exhibit A**

# **Exhibit A**

1 PAOLA M. ARMENI, ESQ.  
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7 Attorneys for Plaintiffs,  
Dwayne L. Schomer and Braylen Schomer,  
8 "Schomer Family"

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 \* \* \*

12 DWAYNE L. SCHOMER, as special  
administrator of THE ESTATE OF KEATON  
13 M. SCHOMER and individually; and  
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15 vs.

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17 ELKO COUNTY; SHERIFF AITOR  
NARVAIZA, individually; UNDERSHERIFF  
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MICHAEL SILVA, individually; DEPUTY  
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DOUGLAS HOLLADAY, individually;  
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DEPUTY DAVID HATCH, individually;  
21 DEPUTY HANNAH KENDALL, individually;  
22 MEDALLUS & VACHAROTHONE LTD; DR.  
RACHOT VACHAROTHONE, individually;  
23 BAILEY POWELL, individually; GEOFFREY  
FISHER, individually; MERCEDES  
24 COCHRELL, individually; LETISCYA  
CHACON, individually; DOE SUPERVISORS  
25 I-X; DOE DEPUTIES I-X; DOE MEDICAL  
STAFF I-X; and ROE ENTITIES I-X,  
26

27 Defendants.  
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CASE NO. 3:23-cv-00390-ART-CSD

**PROTECTIVE ORDER FOR ITEMS  
FROM LEXIPOL, LLC**

1           **1. Classified Information Defined.**

2           “Classified Information” means all materials produced by Lexipol, LLC, in response to a  
3 subpoena in this case.

4           **2. Use of Classified Information.**

5           All Classified Information shall be used solely for the purposes of litigation, trial, and  
6 appeal of this case and for no other purpose and shall not be disclosed except in accordance with  
7 the terms hereof.

8           **3. Ongoing Obligations.**

9           Insofar as the provisions of this Protective Order restrict the communication and use of the  
10 information protected by it, such provisions shall continue to be binding after the conclusion of  
11 this litigation, except that (a) there shall be no restriction on documents that are used as exhibits in  
12 motion practice or open court, and (b) a party may seek written permission of the producing party  
13 or order of the Court with respect to dissolution or modification of this protective order.

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The undersigned counsel hereby stipulates to this protective order.

Respectfully submitted this 19th day of September 2024.

**CLARK HILL PLLC**

**RENCER ANJEWIERDEN**

/s/ Paola M. Armeni, Esq.  
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*Attorneys for Elko County Defendants*

At the conclusion of this case, the court will no longer have jurisdiction over this matter.

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

September 20, 2024